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May 4, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554



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Re: *Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-Based 800 MHz Specialized Mobile Radio Licenses*, WT Docket Nos. 12-64, 11-110; Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On May 4, 2012, David Rines of Fish & Richardson P.C., Counsel for Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”) met with Linda Chang and Brian Regan of the Wireless Telecommunications Bureau. Participating in the meeting by conference call were Michael Rosenthal, Holly Henderson, and Alan McIntyre of SouthernLINC Wireless.

The purpose of this meeting was to discuss the rule changes proposed by the Commission in its *Notice of Proposed Rulemaking* (“NPRM”) in the above-captioned proceeding.<sup>1</sup> In this meeting, SouthernLINC Wireless urged the Commission to promptly adopt its proposal to allow licensees in the ESMR band to deploy and operate technologies that require channels greater than 25 kHz bandwidth on the 800 MHz spectrum authorized by their Economic Area (“EA”) licenses.

As explained in detail in its public filings in response to the *NPRM*, SouthernLINC Wireless stated that by allowing wideband operations in the 800 MHz ESMR band, the Commission will provide 800 MHz ESMR licensees with a technology migration path that will enable the deployment of new, competitive advanced wireless services

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<sup>1</sup> / *Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-based 800 MHz Specialized Mobile Radio Licensees, Request for Declaratory Ruling that the Commission’s Rules Authorize Greater than 25 kHz Bandwidth Operations in the 817-824/862-869 MHz Band*, WT Docket Nos. 12-64, 11-110, Notice of Proposed Rulemaking, FCC 12-25 (rel. Mar. 9, 2012) (“NPRM”).

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and increase the availability of such services to consumers, including those in rural and underserved areas.<sup>2</sup>

SouthernLINC Wireless stated that it understands the concerns expressed by certain commenters regarding potential interference to public safety licensees in the 800 MHz band and explained that the conditions proposed by the Commission for wideband operations in the 800 MHz ESMR band will be more than sufficient to ensure continued interference protection for other 800 MHz licensees, including public safety. SouthernLINC Wireless also noted that, as Sprint Nextel has observed in the record of this proceeding, wideband technologies such as LTE and CDMA operate with a significantly lower spectral density than the iDEN technology currently deployed in the 800 MHz ESMR band, thus making them less likely to cause interference in neighboring bands.<sup>3</sup>

Finally, SouthernLINC Wireless again emphasized the pressing need for the Commission to provide regulatory certainty regarding wideband 800 MHz ESMR operations in order to facilitate investment in and the deployment of new advanced wireless services to the benefit of consumers.

In accordance with the Commission's rules, one copy of this *ex parte* notice is being filed electronically for inclusion in the record of the above-captioned proceeding.

If you should have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

/s/ David D. Rines

David D. Rines

Counsel for SouthernLINC Wireless

cc: Linda Chang  
Brian Regan

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<sup>2</sup> / See Comments of SouthernLINC Wireless in WT Docket Nos. 12-64, 11-110 (filed April 13, 2012) at 8 – 10; Reply Comments of SouthernLINC Wireless in WT Docket Nos. 12-64, 11-110 (filed April 23, 2012) at 2 – 4.

<sup>3</sup> / See, e.g., Comments of Sprint Nextel in WT Docket Nos. 12-64, 11-110 (filed April 13, 2012) at 11.